

Exhibit 54

Statements Challenged in the CAC¹ Arranged by Topic

I. STATEMENTS CONCERNING IONQ'S 32 QUBIT QUANTUM COMPUTER				
	SOURCE(S)	ALLEGED SPEAKER ²	CHALLENGED STATEMENT ³	REASONS NOT ACTIONABLE
1	Registration Statement ⁴ (Ex. 1) ⁵ Proxy Statement (Aug. 12, 2021) (Ex. 5) Form S-1 (Oct. 4, 2021) (Ex. 10) Form 10-Q (Nov. 15, 2021) (Ex. 8) Form 10-K (Mar. 28, 2022) (Ex. 9)	Defendants ⁶	<i>IonQ's 32-qubit system, which is an important milestone for IonQ's technical roadmap and commercialization,</i> is not yet available <i>for customers</i> and may never be available. <i>IonQ is developing its next-generation 32-qubit quantum computer system</i> , which has not yet been made available to customers. (CAC ¶ 157)	Accurate Factual Statement

¹ “CAC” refers to the Consolidated Amended Complaint (Dkt. 64). This chart maintains the emphasis in the CAC.

² While certain Defendants signed certain statements, Defendants are only listing the individuals Plaintiffs have alleged to have made the challenged statement.

³ Though the CAC is unclear as to which statements Plaintiffs specifically challenge, Defendants assume that Plaintiffs are challenging only the bolded, italicized language in the CAC at ¶¶ 155–220 and the pictures from Company presentations cited or referenced in those paragraphs. Bracketed language has been added for context.

⁴ Plaintiffs’ use the term “Registration Statement” to collectively refer to (1) the initial S-4 Registration Statement filed with the SEC on March 30, 2021; (2) the First Amended S-4 Registration Statement filed with the SEC on June 17, 2021; (3) the Second Amended S-4 Registration Statement filed with the SEC on July 16, 2021; and (4) the Third Amended S-4 Registration Statement filed with the SEC on August 4, 2021. See CAC ¶ 24, n. 4. The language in all versions is similar, so Defendants only attach the March 30, 2021, Form S-4 as an exhibit.

⁵ All “Ex_” references are to exhibits attached to the supporting Declaration of Caitlin B. Munley, filed herewith.

⁶ “Legacy IonQ” means IonQ, Inc.; “IonQ Defendants” means IonQ, Inc. (“IonQ”), Peter Chapman (“Chapman”), and Thomas Kramer (“Kramer”); “Defendants” means IonQ, Chapman, Kramer, Niccolo de Masi (“de Masi”), Harry You (“You”), Darla Anderson (“Anderson”), Francesca Luthi (“Luthi”), Charles Wert (“Wert”); “Individual Defendants” means Chapman, Kramer, de Masi, You, Anderson, Luthi, Wert; and “dMY” means dMY Technology Group, Inc.

IonQ MTD Challenged Statement Chart

Prepared by Cooley LLP

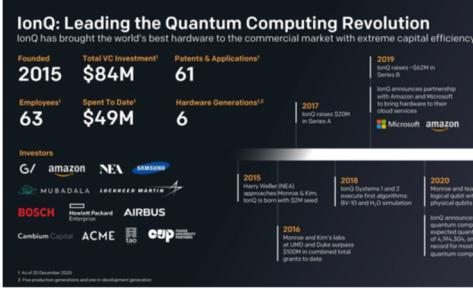
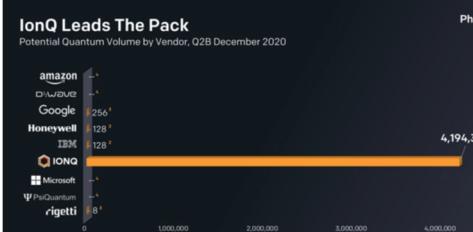
I. STATEMENTS CONCERNING IONQ'S 32 QUBIT QUANTUM COMPUTER				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
2	<p>Form 8-K (attaching Merger Announcement Release, and Roadshow Presentation) (Mar. 8, 2021) (Ex. 7)</p> <p>The Age of Quantum Video⁷ (Mar. 8, 2021) (Ex. 53)</p> <p>Analyst Day Management Presentation (Apr. 13, 2021) (Ex. 11)</p> <p>Press Release <i>IonQ Triples Expectation for 2021 Contract Bookings</i> (Sept. 9, 2021) (Ex. 46)</p> <p>Investor Updates: September 2021 Presentation, (Sept. 13, 2021)⁸ (Ex. 44)</p>	Defendants	<p>“IonQ, Inc. is the leader in quantum computing, with a proven track record of innovation and deployment. <i>IonQ's 32-qubit quantum computer is the world's most powerful quantum computer.</i>”</p> <p>(CAC ¶ 158)</p>	Puffery Opinion
3	<p>Form 8-K (attaching Roadshow Presentation, Slide 8) (Mar. 8, 2021) (Ex. 7)</p> <p>Analyst Day Management Presentation, Slide 10 (Apr. 13, 2021) (Ex. 6)</p>	Defendants	 <p>The Only Public Pure-Play Quantum Opportunity Unparalleled Technological Advantage 32,000x more powerful than competing quantum systems Massive Opportunity Experts expect a TAM of approximately \$65B by 2030 (CAGR of 56.0%) World-Class Team Led by the pioneers of quantum computing Quantum Computation as a Service AWS, Microsoft Azure, and IonQ Quantum Cloud World-Class Investor Base GV, NEA, Mubadala, AWS, Samsung, Airbus, et al. Significant Barriers To Entry Complex technology protected by extensive patent portfolio</p> <p>“The Only Public Pure-Play Quantum Opportunity”; “Unparalleled Technological Advantage”; “32,000x more powerful than competing quantum systems.”</p> <p>(CAC ¶¶ 161, 172)</p>	Accurate Factual Statement

⁷ The CAC incorrectly alleges that the “Announcement Video,” (The Age of Quantum video) was attached to the Form 8-K filed on March 8, 2021. (CAC ¶ 168.)

⁸ The CAC glossary states that the September Presentation is dated September 20, 2021, but the actual date is September 13, 2021. The CAC later acknowledges the correct date. (¶ 207).

IonQ MTD Challenged Statement Chart

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	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE																				
4	Form 8-K (attaching Roadshow Presentation Slide 12) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation Slide 13 (Apr. 13, 2021) (Ex. 11)	Defendants	 <p>IonQ: Leading the Quantum Computing Revolution IonQ has brought the world's best hardware to the commercial market with extreme capital efficiency</p> <table border="1"> <thead> <tr> <th>Founded</th> <th>Total VC Investment¹</th> <th>Patents & Applications²</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>\$84M</td> <td>61</td> </tr> <tr> <td>Employees³</td> <td>Spent To Date⁴</td> <td>Hardware Generations⁵</td> </tr> <tr> <td>63</td> <td>\$49M</td> <td>6</td> </tr> </tbody> </table> <p>Investors G/ amazon NEA SAMSUNG MUBADALA LEARFIELD MARTIN BOSCH DELL Packard AIRBUS Cambium Capital ACME DAY CUP</p> <p>2015 IonQ's first (NEA) approaches Monroe & Kim's bond to form with IBM and 20M need</p> <p>2016 Monroe and Kim's labs 400 qubits and 1000 gates 500M on combined total grants to date</p> <p>2017 IonQ releases 220M in Series A</p> <p>2018 IonQ Systems 1 and 2 bond to IBM's first algorithms, B710 and H2O simulation</p> <p>2019 IonQ releases 562M in Series B</p> <p>2020 IonQ announces partnership with Amazon and Microsoft to provide access to their cloud services</p> <p>Microsoft amazon</p> <p>1 as of December 2020 2 1st production generation and 1st non-development generation</p>	Founded	Total VC Investment ¹	Patents & Applications ²	2015	\$84M	61	Employees ³	Spent To Date ⁴	Hardware Generations ⁵	63	\$49M	6	<p>IonQ: Leading the Quantum Computing Revolution IonQ has brought the world's best hardware to the commercial market with extreme capital efficiency</p> <p>IonQ: Leading the Quantum Computing Revolution; IonQ announces 32 qubit quantum computing with an expected quantum volume of 4,194,304, smashing the record for most powerful quantum computer.</p> <p>(CAC ¶¶ 162, 173)</p>	Forward Looking Puffery Opinion							
Founded	Total VC Investment ¹	Patents & Applications ²																						
2015	\$84M	61																						
Employees ³	Spent To Date ⁴	Hardware Generations ⁵																						
63	\$49M	6																						
5	Form 8-K (attaching Roadshow Presentation Slide 21) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation, Slide 21 (Apr. 13, 2021) (Ex. 11)	Defendants	 <p>IonQ Leads The Pack Potential Quantum Volume by Vendor, Q2B December 2020</p> <table border="1"> <thead> <tr> <th>Vendor</th> <th>Potential Quantum Volume</th> </tr> </thead> <tbody> <tr> <td>amazon</td> <td>~100</td> </tr> <tr> <td>D-Wave</td> <td>~256</td> </tr> <tr> <td>Google</td> <td>~256</td> </tr> <tr> <td>Honeywell</td> <td>~128</td> </tr> <tr> <td>IBM</td> <td>~128</td> </tr> <tr> <td>IONQ</td> <td>4,194,304</td> </tr> <tr> <td>Microsoft</td> <td>~8</td> </tr> <tr> <td>PsiQuantum</td> <td>~8</td> </tr> <tr> <td>Rigetti</td> <td>~8</td> </tr> </tbody> </table> <p><small>1 Estimated quantum volume of IonQ's 5th generation system – assumes 32 qubits with 99.9% fidelity two-bit gates based on internal preliminary results. 2 Actual quantum volume of IonQ's 5th generation system – based on internal preliminary results. 3 Estimated based on published qubit counts and fidelity. 4 Actual spent to date based on published qubit counts and fidelity. 5 Bonding of two companies to form a new company in which each has their own existing portfolio or approach hardware approach. Note: Table reflects different reports and metrics and thus company data is not comparable with other vendors.</small></p> <p>IonQ Leads the Pack: Potential Quantum Volume by Vendor, Q2B December 2020; IonQ 4,194,304</p> <p>[Footnote 1: Estimated quantum volume of IonQ's 5th generation system—assumes 32 qubits with 99.9% fidelity two-bit gates based on internal preliminary results.]</p> <p>(CAC ¶¶ 163, 174)</p>	Vendor	Potential Quantum Volume	amazon	~100	D-Wave	~256	Google	~256	Honeywell	~128	IBM	~128	IONQ	4,194,304	Microsoft	~8	PsiQuantum	~8	Rigetti	~8	Accurate Factual Statement Forward Looking Puffery
Vendor	Potential Quantum Volume																							
amazon	~100																							
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IonQ MTD Challenged Statement Chart

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	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
6	Form 8-K (attaching Roadshow Transcript) (Mar. 8, 2021) (Ex. 7)	Chapman	Slide 21 shows IonQ hardware stacked up against our competitors using quantum volume as a benchmark. As you can see, <i>IonQ is easily winning.</i> (CAC ¶ 164)	Puffery Opinion
7	Form 8-K (attaching Roadshow Presentation Slide 19) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation, Slide 22 (Apr. 13, 2021) (Ex. 6)	Defendants	 “ <i>[M]ost usable qubits</i> ” and the “ <i>highest quantum volume by many orders of magnitude.</i> ” (CAC ¶¶ 166, 177)	Accurate Factual Statement Puffery Opinion
8	Form 8-K (attaching Roadshow Transcript) (Mar. 8, 2021) (Ex. 7)	Chapman	On slide 19, you can see that IonQ is leading in every important aspect of quantum computing, with <i>the most usable qubits</i> , the building blocks for quantum computers.” (CAC ¶ 166)	Accurate Factual Statement
9	The Age of Quantum Video (Mar. 8, 2021) (Ex. 53)	Defendants (unidentified Speaker)	In the five years since its founding, IonQ has remained at the forefront of this quest—the first simulation of water, the first trapped ion system on the cloud, and in October 2020, <i>the world's most powerful quantum computer: a 32-qubit system that is a staggering 32,000 times more powerful than its closest competitors.</i> (CAC ¶ 168)	Accurate Factual Statement Puffery Opinion

I. STATEMENTS CONCERNING IONQ'S 32 QUBIT QUANTUM COMPUTER				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
10	Benzinga Interview Filed pursuant to Rule 425 (Mar. 9, 2021) (Ex. 47)	de Masi	[When an interviewer stated that IonQ's Roadshow Presentation indicated that IonQ's quantum computing system was "32,000x more powerful than competitors with the quantum system," adding, "[o]bviously, with your background, you know [the technology, you know the systems and] <i>what some of those numbers mean.</i> [Is quantum computing, it's not a winner-takes-all market? Is there room for potential a couple players and how will IonQ stay ahead of the pack and keep that market share lead with their technology?"] [Mr. de Masi responded: "And to be honest, I don't think there's going to be anyone that competes with us credibly in the next three, five, seven years because the advantages of getting the customers, getting the revenue, proving this out and getting the capital we provided to continue to drive the lead is going to be really difficult, if not almost impossible, I would argue, to catch up. By the way,] <i>this is the 32 cubit system we're looking at here.</i> " (CAC ¶ 169)]	Accurate Factual Statement

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	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
11	Video Transcript: The Quantum Landscape (Apr. 13, 2021) (Ex. 48)	Defendants (unidentified speaker)	[Honeywell's systems differ from IonQ's systems in that they use an approach where they can only entangle two adjacent ions and then must physically swap and shuttle ions around to create greater entanglement. While this single gate is very high quality, there is time and fidelity overhead for shuttling and swapping.] <i>To date IonQ, by comparison, has a 'fully connected' system, where it can create entanglement between any two ions in a chain of up to 32 qubits at any time, with no shuttling or swapping.</i> (CAC ¶ 175)	Accurate Factual Statement
12	ICR Event Series Discussion (July 15, 2021) (Ex. 4)	Chapman	[Analyst: The first question we got in the chat here is, do you think you can talk about the difference between your system and the Honeywell system considering they're both working with trapped ions to the extent that you understand? Or no?] Chapman: [Yeah. I'd be happy to take that. Not that they've published much, so there's a little bit of speculation here...] You could kind of think of it as the Honeywell system is . . . maybe a good analogy would be <i>they have a two qubit bus and we have a 32 qubit bus</i> . [And maybe trying to take a bit of a classical analogy, as well.] (CAC ¶ 179)	Accurate Factual Statement

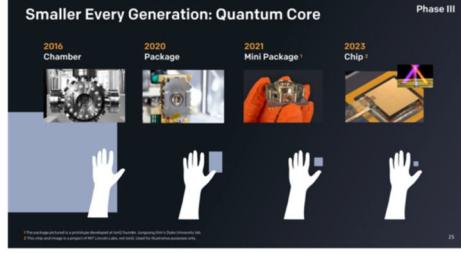
I. STATEMENTS CONCERNING IONQ'S 32 QUBIT QUANTUM COMPUTER				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
13	ICR Event Series Discussion (July 15, 2021) (Ex. 4)	Chapman	<p>[In response to an audience member remark that IonQ had been “advertising the 32 qubit quantum computers so far [in the ICR Discussion,] [b]ut it seems only the 11 qubit quantum computer is on the cloud for now. First of all, is that accurate?”:]</p> <p>Chapman: That is. <i>Both are true.</i></p> <p>[Analyst: And then, is there a timeline that we think the 32 will be available on the full cloud?</p> <p>Chapman: We don’t yet have an exact deadline for the 32. We put our first customers onto the 32 in June, which was on private. So, we’ll continue to do that with private customers through the beta period. And we’ll let you know when we’re going to release it to the cloud.]</p> <p>(CAC ¶180)</p>	Accurate Factual Statement

I. STATEMENTS CONCERNING IONQ'S 32 QUBIT QUANTUM COMPUTER				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
14	IPO Edge Fireside Chat (Sept. 14, 2021) (Ex. 49)	Legacy IonQ (unidentified speaker)	[IonQ's founders have been blazing the trail with groundbreaking quantum computing research for over 25 years. In 2015, our founders, Chris Monroe and Jungsang Kim, decided it was time to turn that research into a quantum computer anyone in the world could use. IonQ was born. In the five years since its founding IonQ has remained at the] forefront [of this quest, the first simulation of water, the first trapped ion system on the cloud, and] in October 2020, <i>the world's most powerful quantum computer, a 32 cubit system that is a staggering 32,000 times more powerful than its closest competitors.</i> (CAC ¶ 181)	Accurate Factual Statement Puffery
15	IonQ's Third Quarter FY 2021 Earnings Call (Nov. 15, 2021) (Ex. 45)	Chapman	Before I jump into the results and the events of the quarter, I wanted to give you some background for those who are new to the IonQ story. <i>IonQ makes the world's most powerful Quantum computers.”</i> (CAC ¶ 183)	Puffery Opinion

I. STATEMENTS CONCERNING IONQ'S 32 QUBIT QUANTUM COMPUTER				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
16	IonQ's Third Quarter FY 2021 Earnings Call (Nov. 15, 2021) (Ex. 45)	Chapman	[In response to an analyst's question about an update on IonQ's systems, Chapman responded: So at the current time, we have] two systems, which are servicing jobs out on the cloud for all three cloud partners and internal for our private cloud. And there is <i>an additional system</i> which is what we call the 32 qubit systems, which right now is in private beta. (CAC ¶ 183)	Accurate Factual Statement

II. STATEMENTS CONCERNING MINIATURIZATION				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
17	Form 8-K (attaching Roadshow Transcript) (Mar. 8, 2021) (Ex. 7)	de Masi	[Cloud revenue growth over the last few months, in fact, reminds me of the early days of the app store. It's growing quickly. Sometimes it's lumpy. There's people all over the world building new apps on IonQ's APIs.] IonQ's technology is <i>uniquely easy to manufacture</i> . In addition to cloud revenue, <i>this manufacture ability of miniaturization advantages</i> mean that IonQ will have the option of selling complete systems to governments and other large counterparties. IonQ <i>has a tremendous lead over other quantum players.</i> (CAC ¶ 186)	Accurate Factual Statement Puffery Opinion

IonQ MTD Challenged Statement Chart**Prepared by Cooley LLP**

II. STATEMENTS CONCERNING MINIATURIZATION				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
18	Form 8-K (attaching Roadshow Presentation Slide 24) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation, Slide 36 (Apr. 13, 2021) (Ex. 6)	Defendants	 <p>IonQ's Leading Modular Architecture Each Generation of IonQ Hardware is Getting Smaller & Cheaper to Build Phase III</p> <p>IBM Google IONQ</p> <p>An IBM engineer working on the custom-built dilution refrigerator casing for a single QPU</p> <p>Google rendering of a planned million-physical-qubit system</p> <p>IonQ ion trap and vacuum chamber in a single, minuscule package*</p> <p>*The package pictured is a prototype developed at IonQ founder Jungsang Kim's Duke University lab.</p>	Accurate Factual Statement Forward Looking Opinion
19	Form 8-K (attaching Roadshow Presentation Slide 25) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation, Slide 37 (Apr. 13, 2021) (Ex. 6)	Defendants	 <p>Smaller Every Generation: Quantum Core Phase III</p> <p>2016 Chamber 2020 Package 2021 Mini Package 2023 Chip</p> <p>*The package pictured is a prototype developed at IonQ founder Jungsang Kim's Duke University lab.</p>	Accurate Factual Statement Forward Looking Puffery Opinion

IonQ MTD Challenged Statement Chart

Prepared by Cooley LLP

II. STATEMENTS CONCERNING MINIATURIZATION				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
20	Form 8-K (attaching Roadshow Presentation Slide 26) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation, Slide 38 (Apr. 13, 2021) (Ex. 6)	Defendants	<p>[Footnote 1: “The system pictured is an early trapped ion system from IonQ founder Chris Monroe’s UMD lab.” Footnote 2: “The system pictured is a prototype developed at IonQ founder Jungsang Kim’s Duke University lab.” Footnote 3: “Illustrative rendering of a potential form-factor for rackmount QPU. Not a designed system.”] (CAC ¶¶ 190, 192)</p>	Accurate Factual Statement Forward Looking
21	Form 8-K (attaching Roadshow Transcript) (Mar. 8, 2021) (Ex. 7)	Chapman	<p>[On Slide 26, you can see the evolution of our quantum computer.] The 2020 systems are <i>the 11 qubit system found on Amazon and Microsoft</i>. The 2021 system is a prototype system at Jungsang’s lab at Duke, <i>now getting to less than a square foot</i>.”</p> <p>(CAC ¶ 191)</p>	Accurate Factual Statement Forward Looking

IonQ MTD Challenged Statement Chart

Prepared by Cooley LLP

III. STATEMENTS CONCERNING ERROR RATES				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
22	IonQ Website (<i>during the putative class period</i>)	Legacy IonQ	 <p>Average Fidelity / Single-qubit gates >99% / Two-qubit gates >98%*. Minimum Fidelity / Single-qubit gates >99% / Two-qubit gates >96%*. [Footnote*: not corrected for state preparation and measurement errors.] (CAC ¶ 195)</p>	Accurate Factual Statement
23	Form 8-K (attaching Roadshow Presentation Slide 23) (Mar. 8, 2021) (Ex. 7) Analyst Day Management Presentation, Slide 34 (Apr. 13, 2021) (Ex. 6)	Defendants	 <p>[Footnote 1: “Estimate based on IonQ technical roadmap and <u>experimental results</u> recently published by IonQ founder Chris Monroe, advisor Ken Brown, and collaborators.”] Footnote 2: “1000:1 based on overhead for surface codes on a 2-D lattice. 1,000,000:1 based on linear connectivity systems.”] (CAC ¶¶ 197, 199)</p>	Accurate Factual Statement Forward Looking

III. STATEMENTS CONCERNING ERROR RATES				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
24	Form 8-K (attaching Roadshow Transcript) (Mar. 8, 2021) (Ex. 7)	Chapman	[Turning to Slide 23, as I've mentioned, all quantum computers will have to use error correction to allow them to run larger programs. The overhead of the error correction function of the error you're trying to overcome. The larger the error, the more error correction is needed.] <i>IonQ competitors may need a thousand or even a million qubits to create a single error corrected qubit, but IonQ will only need 16.</i> (CAC ¶ 198)	Accurate Factual Statement Forward Looking
25	Registration Statement (Ex. 1) Form S-1 (Oct. 4, 2021) (Ex. 10)	Defendants	[Quantum error-correction will likely be necessary to reduce the operational errors in any large-scale quantum computations relevant to commercial problems. Quantum error-correction uses multiple physical qubits to create an error-corrected qubit with lower levels of operational errors.] [F]or solid-state architectures, IonQ estimates that <i>it may take at least 1,000 physical qubits to form a single error-corrected qubit, while for near-term applications with ion traps the ratio is closer to 16:1.</i> (CAC ¶ 200)	Accurate Factual Statement Puffery Opinion

III. STATEMENTS CONCERNING ERROR RATES				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
26	Registration Statement (Ex. 1) Proxy Statement (Aug. 12, 2021) (Ex. 5)	Defendants	[With IonQ's unique architecture, IonQ believes quantum error-correction can be completely coded in software, allowing varying levels and depths of quantum error-correction to be deployed as needed. Because the ion qubits feature very low idle and native error rates and are highly connected,] <i>IonQ expects the error-correction overhead to be about 16:1 to achieve the first useful quantum applications. This contrasts with other approaches, for which IonQ estimates the overhead to be in the range of 1,000:1 to 100,000:1.</i> [IonQ believes its architectural decisions will make its systems uniquely capable of achieving scale. IonQ has published a roadmap for scaling to larger quantum computing systems, with concrete technological innovations designed to significantly shrink the physical size of the systems and their cost per qubit. However, meeting the milestones included in IonQ's roadmap is not guaranteed and is dependent on various technological advancements, which could take longer than expected to realize or turn out to be impossible to achieve.] (CAC ¶ 200)	Forward Looking Opinion
27	Registration Statement (Ex. 1) Proxy Statement (Aug. 12, 2021) (Ex. 5) Form S-1 (Oct. 4, 2021) (Ex. 10)	Defendants	Compared to the trapped ion approach, the qubits generated via superconducting suffer from short coherence times, high error rates, limited connectivity, <i>and higher estimated error-correction overhead (ranging from 1,000:1 to 100,000:1 to realize the error-corrected qubits from physical qubits).</i> (CAC ¶ 200)	Opinion

IV. STATEMENTS CONCERNING IONQ'S CONTRACT BOOKINGS				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
28	Press Release <i>IonQ Triples Expectation for 2021 Contract Bookings</i> (Sept. 9, 2021) (Ex. 46)	Defendants	<p>IonQ, the leader in quantum computing, today announced that it is tripling its expectation for 2021 total contract bookings from its previously announced target of \$5 million to \$15 million. For IonQ, <i>this commercial success demonstrates the real and rapidly accelerating need for quantum computing among enterprise customers</i> and cements its leadership position in quantum computing. IonQ anticipates these bookings to generate recognized revenue over the next 36 months.</p> <p>(CAC ¶ 202)</p>	Forward Looking Puffery
29	Press Release <i>IonQ Triples Expectation for 2021 Contract Bookings</i> (Sept. 9, 2021) (Ex. 46)	Chapman	<p>We could not be more thrilled with the progress we are seeing in IonQ's commercial efforts as <i>a growing number of customers are adopting quantum computing</i>. Quantum computing has arrived and is solving real-world problems in 2021. <i>We fully expect to see more marquee wins as our industry-leading technology</i> continues to advance . . . Tripling our expectation for bookings <i>validates that the market for quantum computing is here now. We are bringing quantum computing to the Fortune 500</i>, along with leading governmental and academic institutions. The future looks bright for IonQ, and we are just getting started.</p> <p>(CAC ¶ 203)</p>	Forward Looking Puffery Opinion
30	Press Release <i>IonQ Triples Expectation for 2021 Contract Bookings</i> (Sept. 9, 2021) (Ex. 46)	de Masi	<p><i>[T]he demand for IonQ's quantum computers has never been clearer.</i></p> <p>(CAC ¶ 204)</p>	Puffery Opinion

IonQ MTD Challenged Statement Chart

Prepared by Cooley LLP

IV. STATEMENTS CONCERNING IONQ'S CONTRACT BOOKINGS				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
31	IonQ's Twitter Post (Sept. 9, 2021) (Ex. 50)	Legacy IonQ	<p><i>We've tripled our expectation for 2021 contract bookings! The market for quantum computing is growing at a rapid pace, and IonQ is both driving and capturing that increased demand.</i></p> <p>(CAC ¶ 205)</p>	Accurate Factual Statement Puffery Opinion
32	Investor Updates: September 2021 Presentation, Slide 17 (Sept. 13, 2021) (Ex. 44)	Defendants	<p><i>IonQ Projects 3x Increase in 2021 Contract Bookings . . . IonQ believes this anticipated commercial success demonstrates the real and rapidly accelerating need for quantum computing and cements IonQ's leadership position in quantum computing.</i></p> <p>(CAC ¶ 208)</p>	Forward Looking Puffery Opinion
33	IPO Edge Fireside Chat (Sept. 14, 2021) (Ex. 49)	de Masi	<p>The quantum era has clearly arrived. How do I know this? <i>Well, last week IonQ tripled bookings guidance for 2021 . . . I really can't emphasize enough what an outstanding achievement this is not only technologically, but also for Peter and Thomas as the CEO and CFO. I don't know a lot of IPO's or companies in general that have literally increased in the middle of the year, the revenue, effectively monetization proxy by 200%, and it is still only September. . . If that doesn't prove the quantum era is here, I'm not sure what does. . . We're striking partnership with customers who care about solving problems today, and we're just getting started.</i></p> <p>(CAC ¶ 210)</p>	Accurate Factual Statement Puffery Opinion

IV. STATEMENTS CONCERNING IONQ'S CONTRACT BOOKINGS				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
34	IonQ Business Update Call (Sept. 20, 2021) (Ex. 51)	Kramer	<p>Earlier this month, we announced that <i>we were on track to significantly exceed our previously announced 2021 bookings target of \$5 million, and instead expect to end up at \$15 million for the full year.</i> This is a powerful demonstration of the results of our commercialization efforts, and that <i>real quantum cases are here</i>, right now. While we are still in early days, <i>there is already tangible demand for quantum computing power</i>, and we believe this is just the beginning of our monetization story.</p> <p>(CAC ¶ 211)</p>	<p>Forward Looking Puffery Opinion</p>

IV. STATEMENTS CONCERNING IONQ'S CONTRACT BOOKINGS				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
35	Press Release <i>IonQ Announces Third Quarter 2021 Financial Results</i> (Nov. 15, 2021) (Ex. 52)	Defendants	<p>IonQ's bookings results <i>demonstrate the Company's leadership and growing demand for IonQ's industry-leading trapped-ion hardware</i>. IonQ is the only maker of quantum hardware that is available through every major cloud provider in the United States, which includes Amazon Web Services, Microsoft Azure, and Google Cloud. <i>This gives public and private sectors unprecedented access to the Company's technology.</i></p> <p>(CAC ¶ 213)</p>	Puffery Opinion
36	IonQ's Third Quarter FY 2021 Earnings Call (Nov. 15, 2021) (Ex. 45)	Chapman	<p><i>We are proud to announce that we've tripled our bookings expectations for fiscal year 2021.</i> This past quarter, we announced partnerships and collaborations with world class companies, including Goldman Sachs, Fidelity Center for Applied Technology, Accenture and GE Research, as well as with educational institutions like the University of Maryland. [We continue to make progress towards new and exciting applications and customer wins.]</p> <p>(CAC ¶ 214)</p>	Accurate Factual Statement

IonQ MTD Challenged Statement Chart

Prepared by Cooley LLP

IV. STATEMENTS CONCERNING IONQ'S CONTRACT BOOKINGS				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
37	IonQ's Third Quarter FY 2021 Earnings Call (Nov. 15, 2021) (Ex. 45)	Chapman	<p>[In response to the question, “about the bookings and mix of bookings year-to-date, what can you tell us about <i>the number of customers or deals</i> within that [15] million of bookings, and about <i>the mix of customers and use cases</i> that you’ve seen this year?” :] What we have seen to date is that <i>we’ve seen thousands of customers running projects on our machines</i> [with billions of shots in terms of running their quantum computations]. We continue to see a mix of customers coming in through our public cloud where we actually don’t know who all the customers are, [because that fits with the public cloud provider], and we have customers on a private cloud as well. We are to date not going to break out the individual customer names because many of these actually covered by confidentiality process.</p> <p>(CAC ¶ 215)</p>	Accurate Factual Statement
38	IonQ's Third Quarter FY 2021 Earnings Call (Nov. 15, 2021) (Ex. 45)	Kramer	<p>[When asked, “I think you had a small number of contracts that provided most of the upside to your, your 2021 number here. Can you give us a sense of what you’re looking at in terms of the bookings pipeline today?”:] So we have been busily talking to potential customers and partners for probably two years now. And it’s only been recently that we’ve been able to come to the market with an actual product that we can sell. And what we have seen is that <i>the reception in the market was larger and faster than we had anticipated.</i></p> <p>(CAC ¶ 216)</p>	Opinion

V. CERTIFICATION STATEMENTS ⁹				
	SOURCE(S)	ALLEGED SPEAKER	CHALLENGED STATEMENT	REASONS NOT ACTIONABLE
39	Form 10-K (Mar. 28, 2022) (Ex. 9)	Chapman Kramer	Reviewed the annual report on Form 10-K of the IonQ, Inc. [and] ...[b]ased on my knowledge [the] report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report.” “[The 2021 10-K] fully complies with the requirements of Section 13(a) or Section 15(d) of the Exchange Act [and] fairly presents, in all material respects, the financial condition and results of operations [of IonQ].” (CAC ¶ 218)	Accurate Factual Statement
40	Form 10-Q (Nov. 15, 2021) (Ex. 8)	Chapman Kramer	“[t]he [Q3 2021 10-Q] fully complies with the requirements of Section 13(a) or 15(d) of the [Exchange Act] (15 U.S.C. 78m) [and] fairly present[], in all material respects, the financial condition and results of operations [of IonQ].” (CAC ¶ 220)	Accurate Factual Statement

⁹ While the certification statements are not bolded or italicized in the CAC, they are included here because Defendants were able to discern the challenged language as the statements are in their own section of the CAC and are comprised of a single quote.